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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

11 CYNTHIA SPEED,
12 Plaintiff,
13 vs.
14 DELTA AIR LINES, INC., a Delaware
15 Corporation; and DOES 1 through 50
16 Inclusive,
17 Defendant.
18
19) Case No. 2:24-cv-8687 TJH (MARx)
) (Removed From Los Angeles Superior
) Court Case No. 24TRCV02879)
) Assigned for All Purposes To:
) Judge: Hon. Terry J. Hatter Jr.
) Ctrm: 9C
)
) **NOTICE OF MOTION AND**
) **DEFENDANT DELTA AIR LINES**
) **INC.'S MOTION FOR RULE 11**
) **SANCTIONS**
)
) Date: June 2, 2025
) Time: No Appearance Necessary
) Ctrm: 9C

1 **TO PLAINTIFF CYNTHIA SPEED AND PLAINTIFF'S ATTORNEYS**
2 **OF RECORD:**

3 **PLEASE TAKE NOTICE** that on June 2, 2025, or as soon thereafter as this
4 matter may be heard in Courtroom 9C of the above-entitled Court located at 350 W.
5 1st Street, 9th Floor, Los Angeles, CA 90012, Defendant DELTA AIR LINES, INC.
6 (“Delta” or “Defendant”), by and through its attorneys of record, will and hereby
7 submits this Motion for Sanctions against Plaintiff CYNTHIA SPEED (“Plaintiff”)
8 and Plaintiff’s Counsel pursuant to FRCP Rule 11(b).

9 This Motion is based on the grounds that the arguments raised in Plaintiff’s
10 Motion to Remand are frivolous and unsupported by case law regarding diversity
11 jurisdiction under 28 U.S.C. § 1332(a). Sanctions are warranted because Plaintiff had
12 no legal basis for seeking remand. As a result, the Court should sanction Plaintiff and
13 her counsel in a manner that will deter from future violations of Rule 11.

14 This Motion is based upon this Notice of Motion and Motion, the
15 accompanying Memorandum of Points and Authorities, the Declaration of Nicole A.
16 Legrotaglie, and exhibits thereto, all pleadings and papers filed herein, records of the
17 Court, matters upon which the Court may or shall take judicial notice, and upon such
18 oral and documentary evidence that may be properly presented by the parties at the
19 hearing on this Motion.

20
21 Dated: April 29, 2025 CDF LABOR LAW LLP



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23 By: _____
24 Nicole A. Legrotaglie
25 Attorneys for Defendant
26 Delta Air Lines, Inc.
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28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE.

I, the undersigned, declare that I am employed in the aforesaid County, State of California. I am over the age of 18 and not a party to the within action. My business address is 18300 Von Karman Avenue, Suite 800, Irvine, CA 92612. On April 29, 2025, I served upon the interested party(ies) in this action the following document described as: **NOTICE OF MOTION AND DEFENDANT DELTA AIR LINES INC.'S MOTION FOR RULE 11 SANCTIONS**

By the following method:

Phillip P. DeLuca, Esq.
LAW OFFICES OF PHILLIP P. DeLUCA
5820 E. Naples Plaza,
Belmont Shore, CA 90803
Tel: (562) 987-1300

E-MAIL: philippdeluca@gmail.com;
cc: jrs@philippdeluca.com; dbd@philippdeluca.com;
grl@philippdeluca.com

For processing by the following method:

- (via FRCP)** Pursuant to FRCP Rule 5(b)(2)(E), I caused the documents to be sent to the persons at the electronic service addresses listed above pursuant to the parties' agreement to electronic service.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 29, 2025, at Irvine, California.

Ana Cantoran
(Type or print name)

Ava Cantoran

(Signature)